

# **EXHIBIT “A”**

## **Summary of Documents Produced in Response to Plaintiffs’ Requests**

**SUMMARY OF DISCOVERY REQUESTS/RESPONSES  
as of June 3, 2005**

06/03/04 Court Ordered Disclosure of Named Plaintiffs' Case Files from -- AG's Office  
Total > 7789 pages

**12/17/04 Plaintiff's 1<sup>st</sup> Request for Production of Documents**  
35 Requests Propounded,  
35 Requests Responded to on March 4, 2005  
Requests #7, 8, 9, 20 and 29 Supplemented on March 23, 2005  
Requests #2 and 5 Supplemented on April 11, 2005  
Total 26,516 pages so far

**12/22/04 Plaintiff's 2<sup>nd</sup> Request for Production of Documents**  
2 Requests Propounded  
2 Requests Responded to on January 24, 2005  
Total 0 so far

12/28/04 Defendants' Initial Disclosures to Plaintiffs w/ Privilege Log  
Total 1130 pages\* does not include disclosures without corresponding pages

12/28/04 Defendants' Supplementation of Computerized Documentation and Case Records  
of Named Plaintiffs  
Supplemented on January 14, 2005  
Supplemented on April 11, 2005  
Total 1120 pages so far with privilege logs

**02/02/05 Plaintiffs' Third Request for Production of Documents**  
25 Requests Propounded  
25 Requests Responded to on April 3, 2005  
Request #16 Supplemented on March 11, 2005  
Total 2155 pages so far with privilege logs

**04/14/05 Plaintiffs' 1<sup>st</sup> Interrogatories to Defendants**  
23 Interrogatories Propounded  
23 Interrogatories Responded to on May 24, 2005  
Total 1264 pages

**04/14/05 Plaintiffs' 4<sup>th</sup> Request for Production of Documents**  
4 Requests Propounded  
4 Requests Responded to on May 24, 2005  
Total 1788 pages so far

**04/20/05 Plaintiff's 5<sup>th</sup> Request for Production of Documents**  
13 Requests Propounded  
13 Requests Responded to on May 31, 2005  
Total 1792 pages so far